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15 **UNITED STATES DISTRICT COURT**  
 16 **DISTRICT OF NEVADA**

17 NEIL ANDREW STICKNEY,  
 18 Plaintiff,

19 vs.

20 THE UNITED STATES OF AMERICA,  
 21 Defendant.

22 Case No. 2:23-cv-01827-JAD-BNW

23 **Stipulation and Order to Extend  
 24 Deadline for Proposed Joint Pretrial  
 25 Order**

26 **(Fourth Request)**

27 Pursuant to LR IA 6-1 and LR 26-3, the parties request a 45- day extension, from June  
 28 12, 2025, to July 28, 2025, to file the proposed joint pretrial order. The parties have diligently  
 1 conducted—indeed completed—discovery. However, unforeseen circumstances necessitate  
 2 this request to extend the deadline for the proposed joint pretrial order. This is the fourth  
 3 request for an extension of any deadline in the original discovery plan and scheduling order.

4 **DISCOVERY COMPLETED**

5 The parties have completed the following discovery:

6 1. Defendant made its initial disclosures on February 8, 2024.

7 2. Plaintiff made his initial disclosures on February 5, 2024.

8 3. Plaintiff served his first supplement to initial disclosures of witnesses and  
 9 documents on February 20, 2024.

4. Defendant served its first set of requests for production and first set of interrogatories on Plaintiff on April 11, 2024.

5. Plaintiff served his second, third, fourth and fifth supplements to initial disclosures of witnesses and documents on May 13, 2024.

6. Plaintiff served his responses to Defendant's first set of requests for production and first set of interrogatories on May 15, 2024.

7. Plaintiff served his first set of requests for production, first set of interrogatories and first set of requests for admission on Defendant on May 24, 2024.

8. Defendant served its first supplement to initial disclosures of witnesses and documents on June 6, 2024.

9. Defendant served its responses to Plaintiff's first set of requests for production, first set of interrogatories and first set of requests for admission on June 20, 2024.

10. Defendant served its second supplement to initial disclosures of witnesses and documents on August 12, 2024.

11. Plaintiff served his sixth supplement to initial disclosures on August 12, 2024.

12. Plaintiff provided HIPAA authorizations to allow Defendant to obtain Plaintiff's pertinent medical records. Defendant is in the process of obtaining Plaintiff's medical records.

13. Defendant took Plaintiff's deposition on July 9, 2024.

14. Plaintiff served his initial expert disclosures on February 13, 2025.

15. Defendant served its third supplement to initial disclosures of witnesses and documents on March 20, 2025.

16. Plaintiff took the deposition of Jeffrey Zabel, M.D. on March 21, 2025.

## DISCOVERY REMAINING

The parties have completed discovery. The parties seek only an extension of time to prepare and file the proposed joint pretrial order.

## **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

Due to unforeseen circumstances, the assigned AUSA, Thomas Colonna, who has litigated and is familiar with this case, is presently unavailable to prepare Defendant's portions of the proposed joint pretrial order and otherwise work on the document with Plaintiff's counsel. As a result, the United States respectfully seeks, and Plaintiff does not oppose, additional time for the preparation and completion of the proposed joint pretrial order.

**EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

The following table sets forth the current deadlines and the proposed 45-day extension that is the subject of this request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Proposed Joint Pretrial Order	June 12, 2025	July 28, 2025

This request for an extension of time is not sought for any improper purpose including undue delay. This is the fourth request for an extension of a deadline established in the original discovery plan and scheduling order.

Respectfully submitted this 22nd day of May 2025.

LAIRD LAW, PLLC

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## IT IS SO ORDERED:

Bernswekey  
UNITED STATES MAGISTRATE JUDGE

DATED: 5/30/2025